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FILE NO: 68892-000108

March 15, 2010

VIA U.S. AND ELECTRONIC MAIL

Craig Whitenack
Civil Investigator
United States Environmental Protection Agency
Region IX, Southern California Field Office
600 Wilshire Avenue, Suite 1420
Los Angeles, California 90017

Re: Response to U.S. EPA Request for Information Pursuant to Section 104(e)
of CERCLA
Yosemite Creek Superfund Site—San Francisco, California

Dear Mr. Whitenack:

Enclosed is the response prepared by Alcoa Inc. to the letter dated October 15, 2009 from James Hanson, Chief, Enforcement and Removal Operations Section, Superfund Division, U.S. Environmental Protection Agency, Region IX, to Klaus Kleinfeld, President and CEO of Alcoa Inc., regarding the Yosemite Creek Superfund Site located in San Francisco, California.

If you have any questions, please contact me.

Best regards,

Malcolm C. Weiss

Enclosures

cc: James Hansen, U.S. EPA (w/o enclosures)
Sanford W. Harvey, Jr. (w/ enclosures)

Alcoa's Response to EPA CERCLA Section 104(e) Request for Information
Yosemite Creek Superfund Site, San Francisco, California

Below is the response of Alcoa Inc., a Pennsylvania corporation with its principal office in New York, New York ("Alcoa"), to the letter dated October 15, 2009 from James Hanson, Chief, Enforcement and Removal Operations Section, Superfund Division, U.S. Environmental Protection Agency ("EPA"), Region IX, to Klaus Kleinfeld, President and CEO of Alcoa, regarding the Yosemite Creek Superfund Site located in San Francisco, California (the "Site"). EPA alleges that the Site has been impacted by the former Bay Area Drum site located at 1212 Thomas Avenue in San Francisco, California ("Bay Area Drum Site"), which is the subject of EPA's request for information. EPA's October 15, 2009 letter references Reynolds Metals Company ("Reynolds") as the "generator name." Reynolds, a wholly-owned subsidiary of Alcoa, is a Delaware corporation with its principal office in New York, New York. Alcoa acquired Reynolds in May 2000. Thus, for purposes of this response, Alcoa considers EPA's use of the term "Respondent" to include only Reynolds, its subsidiaries, divisions, affiliates, branches, and predecessors.

Alcoa believes that EPA's October 15, 2009 request for information is vague, overbroad, unduly burdensome and, in certain contexts, may exceed EPA's statutory authority under section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act, as amended ("CERCLA"). In addition, on May 22, 1992, the California Department of Toxic Substances Control ("DTSC") sent Reynolds an information request regarding its transactions with the Bay Area Drum Company. DTSC's May 22, 1992 information request is attached as Exhibit A to this response. Reynolds's June 19, 1992 response to DTSC's information request is attached as Exhibit B to this response. Because EPA's request for information covers the same subject matter as DTSC's 1992 inquiry, it is unnecessarily duplicative.¹

Alcoa has conducted an extensive search for records and information from persons and files considered most likely to have relevant information regarding EPA's request for information. EPA seeks information dating back several decades; however, Reynolds's record retention policy for documents covered by EPA's request for information has long since expired. In addition, during this time period, Reynolds sold or transferred certain entities, and as a result, relevant documents regarding the operations of such entities were transferred in the normal course of business (and therefore not retained by Reynolds) as part of such transactions. This response does not constitute a waiver of the right to object to any future, additional, or supplemental requests covering the same or similar subject matter. Nothing contained in these responses and objections is intended as, or shall in any way be deemed, a waiver by Alcoa of any applicable privilege or doctrine.

For ease of reference, EPA's numbered information requests (included as Enclosure B to its October 15, 2009 letter) are shown below in bold followed by Alcoa's response.

¹ Please note that Reynolds's 1992 response was limited to the facility known as the "San Francisco Can Plant." In 1998, two years prior to Alcoa acquiring Reynolds, Reynolds sold the former San Francisco Can Plant.

1. Describe generally the nature of the business conducted by Respondent and identify the products manufactured, formulated, or prepared by Respondent throughout its history of operations.

Alcoa is a global company operating in 31 countries that produces and manages primary aluminum, fabricated aluminum and alumina combined, through its active participation in all major aspects of the industry. Alcoa serves the aerospace, automotive, packaging, building and construction, commercial transportation and industrial markets, bringing design, engineering, production and other capabilities of Alcoa's businesses to customers. In addition to aluminum products and components including flat-rolled products, hard alloy extrusions, and forgings, Alcoa also markets Alcoa® wheels, fastening systems, precision and investment castings, and building systems.

2. Provide the name (or other identifier) and address of any facilities where Respondent carried out operations between 1940 and 1988 (the "Relevant Time Period") and that:

- a. ever shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale.**

Reynolds San Francisco Can Plant
2425 Whipple Road
Hayward, California 94540

- b. are/were located in California (excluding locations where ONLY clerical/office work was performed);**

Reynolds Torrance Can Plant
500 Crenshaw Boulevard
Torrance, California 90509

Reynolds Torrance Extrusion Plant
2315 Dominguez Street
Torrance, California 90508

Reynolds West Coast End Plant
3939 Cincinnati Avenue
Rocklin, California 95677

Reynolds Aluminum Supply Company (RASCO) Fresno Facility
Fresno, California
Address Unknown—Closed prior to 1990

RASCO Livermore Facility
5476 Brisa Street

Alcoa Response to EPA CERCLA 104(e) Request
Yosemite Creek Superfund Site
March 15, 2010

Livermore, California 94550

RASCO Los Angeles Facility
6446 East Washington Boulevard
Los Angeles, California 90054

RASCO San Diego Facility
2300 Haffly Avenue
National City, California 92050

RASCO San Francisco Facility
San Francisco, California
Address Unknown—Closed prior to 1990

Reynolds Aluminum Recycling Company
9910 East 6th Street
Rancho Cucamonga, California 91730

Reynolds Aluminum Recycling Company
40535 Albrae Street
Fremont, California 94538

Reynolds Los Angeles Recycling Center
Los Angeles, California
Address Unknown—Closed prior to 1990

Reynolds Sacramento Recycling Center
Sacramento, California
Address Unknown—Closed prior to 1990

Southern Graphics Systems ("SGS") Oakland Facility
Oakland, California
Address Unknown—Closed prior to 1990

Alcoa has not located or identified information or records that indicate that the facilities identified in response to Request No. 2.b. engaged in any transactions with the former Bay Area Drum Company.

- c. are/were located outside of California and shipped any drums or other containers to California for recycling, cleaning, reuse, disposal, or sale (for drums and containers that were shipped to California for sale, include in your response only transactions where the drums and containers themselves were an object of the sale, not transactions where the sole object of the sale was useful product contained in a drum or other container).**

Alcoa has not located or identified any documents or records responsive to Request No. 2.c. Documents within the scope of this request have been destroyed in accordance with Reynolds's document retention policy.

- 3. Provide a brief description of the nature of Respondent's operations at each Facility identified in your response to Question 2 (the "Facilities") including:**
- a. the date such operations commenced and concluded; and**
 - b. the types of work performed at each location over time, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.**

Reynolds San Francisco Can Plant

Between 1981 and 1984, the former San Francisco Can Plant reportedly sold 1,338 empty drums to the Bay Area Drum Site. To the best of Alcoa's knowledge, the former Reynolds San Francisco Can Plant is the only Alcoa facility that had business transactions with the former Bay Area Drum Company. The former Reynolds San Francisco Can Plant manufactured aluminum beverage and wine cans by a draw and iron process. Plant operations began in 1970. In 1998, two years prior to Alcoa acquiring Reynolds, Reynolds sold its North American aluminum beverage can operations to Ball Corporation ("Ball"), which included the San Francisco Can Plant.

Reynolds Torrance Can Plant

The former Torrance Can Plant manufactured aluminum beverage cans. Plant operations began in 1966. In 1998, Reynolds sold its North American aluminum beverage can operations to Ball, which included the Torrance Can Plant.

Reynolds Torrance Extrusion Plant

The former Torrance Extrusion Plant manufactured extruded aluminum shapes and tubing and fabricated solar collector panels. Plant operations commenced in 1961 and closed in 1993 approximately 7 years before Alcoa acquired Reynolds.

Reynolds West Coast End Plant

The former West Coast End Plant manufactured aluminum can ends. Plant operations commenced in 1980. In 1998, Reynolds sold its North American aluminum beverage can operations to Ball, which included the West Coast End Plant.

Reynolds RASCO Facilities Listed in Response 2.b.

RASCO, a former division of Reynolds, provided supply chain management of aluminum, stainless steel and other specialty metals to customers located in the United States, Canada and Mexico. Integris Metals, a metals service center company that processes and distributes metals, was formed in November 2001 through the combination of RASCO and North American Metals Distribution, Inc. In January 2005, Integris Metals was sold to Ryerson Tull, Inc. Alcoa has not located or identified documents or records describing the types of work performed at the RASCO facilities identified in Response 2.b., above.

Reynolds Recycling Centers Listed in Response 2.b.

The former Recycling Centers identified in Response 2.b., above, sorted, graded, and packaged used beverage cans. Such materials were likely sent from the recycling centers to melting and fabricating facilities located throughout the United States. In 1998, two years prior to Alcoa acquiring Reynolds, Reynolds sold its recycling centers division to Wise Recycling LLC.

SGS Oakland Facility

SGS, a former Reynolds subsidiary, provided design, pre-press, imaging and other graphic services to its customers. To the best of Alcoa's knowledge, the only SGS facility that operated in California was located in Oakland and was closed prior to 1990. In December 2005, Alcoa sold SGS to Citigroup Venture Capital Equity Partners. Alcoa has not located or identified documents or records describing the types of work performed at the former SGS facility identified in Response 2.b., above.

4. For each Facility, describe the types of records regarding the storage, production, purchasing, and use of Substances of Interest ("SOI") during the Relevant Time Period that still exist and the periods of time covered by each type of record.

EPA's "Information Request Definitions," in its October 15, 2009 request for information, defines "Substance of Interest" or "SOI" as all contaminants of concern ("COC"), which include lead, zinc, mercury, dichlorodiphenyltrichloroethane ("DDT"), chlordane, dieldrin, and polychlorinated biphenyls ("PCBs"), as well as, hydraulic oils and transformer oils.

Reynolds San Francisco Can Plant

Alcoa has not identified any documents or records indicating that the former Reynolds San Francisco Can Plant stored, produced or purchased any SOI during the Relevant Time Period.

Reynolds Torrance Can Plant

Alcoa has not identified any documents or records indicating that the former Reynolds Torrance Can Can Plant stored, produced or purchased any SOI during the Relevant Time Period.

Reynolds Torrance Extrusion Plant

Alcoa has not identified any documents or records indicating that the former Reynolds Torrance Extrusion Plant stored, produced or purchased any SOI during the Relevant Time Period.

Reynolds West Coast End Plant

Alcoa has not identified any documents or records indicating that the former Reynolds West Coast End Plant stored, produced or purchased any SOI during the Relevant Time Period.

Reynolds RASCO Facilities Listed in Response 2.b.

Alcoa has not identified any documents or records indicating that the former Reynolds RASCO facilities listed in Response 2.b., above, stored, produced or purchased any SOI during the Relevant Time Period.

Reynolds Recycling Centers Listed in Response 2.b.

Alcoa has not identified any documents or records indicating that the former Reynolds Recycling Centers listed in Response 2.b., above, stored, produced or purchased any SOI during the Relevant Time Period.

SGS Oakland Facility

Alcoa has not identified any documents or records indicating that the former SGS facility located in Oakland, California stored, produced or purchased any SOI during the Relevant Time Period.

- 5. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store one of the COCs (including any substances or wastes containing the COCs) at any of the Facilities? State the factual basis for your response.**

EPA's "Information Request Definitions," in its October 15, 2009 request for information, defines the term "COC" as lead, zinc, mercury, DDT, chlordane, dieldrin, and PCBs.

Reynolds San Francisco Can Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds San Francisco Can Plant produced, purchased, used or stored any COC's.

Reynolds Torrance Can Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds Torrance Can Plant produced, purchased, used or stored any COC's.

Reynolds Torrance Extrusion Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds Torrance Extrusion Plant produced, purchased, used or stored any COC's.

Reynolds West Coast End Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds West Coast End Plant produced, purchased, used or stored any COC's.

Reynolds RASCO Facilities Listed in Response 2.b.

Alcoa has not located or identified any documents or records indicating that the former Reynolds RASCO facilities listed in Response 2.b., above, produced, purchased, used or stored any COC's.

Reynolds Recycling Centers Listed in Response 2.b.

Alcoa has not located or identified any documents or records indicating that the former Reynolds Recycling Centers listed in Response 2.b., above, produced, purchased, used or stored any COC's.

SGS Oakland Facility

Alcoa has not located or identified any documents or records indicating that the former SGS facility located in Oakland, California produced, purchased, used or stored any COC's.

- 6. If the answer to Question 5 is yes, identify each COC produced, purchased, used, or stored at each Facility.**

Not applicable.

- 7. If the answer to Question 5 is yes, identify the time period during which each COC was produced, purchased, used, or stored at each Facility.**

Not applicable.

- 8. If the answer to Question 5 is yes, identify the average annual quantity of each COC produced, purchased, used, or stored at each Facility.**

Not applicable.

- 9. If the answer to Question 5 is yes, identify the volume of each COC disposed by the Facility annually and describe the method and location of disposal.**

Not applicable.

- 10. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store hydraulic oil or transformer oil at any of the Facilities? State the factual basis for your response to this question.**

Reynolds San Francisco Can Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds San Francisco Can Plant produced, used, or stored any hydraulic oil or transformer oil. According to Reynolds's June 19, 1992 response letter to DTSC (attached as Exhibit B to this response), prior to the drums being emptied, cleaned and sold to the Bay Area Drum Company, such drums contained petroleum-based process and lubrication oils.

Reynolds Torrance Can Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds Torrance Can Plant produced, used, or stored any hydraulic oil or transformer oil.

Reynolds Torrance Extrusion Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds Torrance Extrusion Plant produced, used, or stored any hydraulic oil or transformer oil.

Reynolds West Coast End Plant

Alcoa has not located or identified any documents or records indicating that the former Reynolds West Coast End Plant produced, used, or stored any hydraulic oil or transformer oil.

Reynolds RASCO Facilities Listed in Response 2.b.

Alcoa has not located or identified any documents or records indicating that the former Reynolds RASCO facilities listed in Response 2.b., above, produced, used, or stored any hydraulic oil or transformer oil.

Reynolds Recycling Centers Listed in Response 2.b.

Alcoa has not located or identified any documents or records indicating that the former Reynolds Recycling Centers listed in Response 2.b., above, produced, used, or stored any hydraulic oil or transformer oil.

SGS Oakland Facility

Alcoa has not located or identified any documents or records indicating that the former SGS facility located in Oakland, California produced, used, or stored any hydraulic oil or transformer oil.

11. If the answer to Question 10 is yes, identify each specific type of hydraulic oil and transformer oil produced, purchased, used, or stored at each Facility.

Not applicable.

12. If the answer to Question 10 is yes, identify the time period during which each type of hydraulic oil and transformer oil was produced, purchased, used, or stored.

Not applicable.

13. If the answer to Question 10 is yes, identify the average annual quantity of each type hydraulic oil and transformer oil purchased, produced, used, or stored at each Facility.

Not applicable.

14. If the answer to Question 10 is yes, identify the volume of each hydraulic oil and transformer oil disposed by the Facility annually and describe the method and location of disposal.

Not applicable.

15. Provide the following information for each SOI (SOIs include any substance or waste containing the SOI) identified in your responses to Questions 5 and 10:

- a. Describe briefly the purpose for which each SOI was used at the Facility. If there was more than one use, describe each use and the time period for each use;

- b. Identify the supplier(s) of the SOIs and the time period during which they supplied the SOIs, and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks and other documents pertaining to the procurement of the SOI;**
- c. State whether the SOIs were delivered to the Facility in bulk or in closed containers, and describe any changes in the method of delivery over time;**
- d. Describe how, where, when, and by whom the containers used to store the SOIs (or in which the SOIs were purchased) were cleaned, removed from the Facility, and/or disposed of, and describe any changes in cleaning, removal, or disposal practices over time.**

Not applicable. See response to Request No. 4, above.

- 16. For each SOI delivered to the Facilities in closed containers, describe the containers, including but not limited to:**
- a. the type of container (e.g. 55 gal. drum, tote, etc.);**
 - b. whether the containers were new or used; and**
 - c. if the containers were used, a description of the prior use of the container.**

Not applicable. See response to Request No. 4, above.

- 17. For each container that Respondent used to store a SOI or in which SOIs were purchased (“Substance-Holding Containers” or “SHCs”) that was later removed from the Facility, provide a complete description of where the SHCs were sent and the circumstances under which the SHCs were removed from the Facility. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent’s practices over time.**

Not applicable. To the best of Alcoa’s knowledge, no SOI’s were produced, used, or stored at the facilities identified in response to Request No. 2, above. Thus, Alcoa does not believe that any such facilities used any SHC’s.

- 18. For each SHC that was removed from the Facility, describe Respondent’s contracts, agreements, or other arrangements under which SHCs were removed from the Facility, and identity all parties to each contract, agreement, or other arrangement described. Distinguish between the Relevant Time Period and the time period since 1988.**

Not applicable. See response to Request No. 17, above.

- 19. For each SHC, provide a complete explanation regarding the ownership of the SHC prior to delivery, while onsite, and after it was removed from the Facility. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent’s practices over time.**

Not applicable. See response to Request No. 17, above.

- 20. Identify all individuals who currently have, and those who have had, responsibility for procurement of Materials at the Facilities. Also provide each individual's job title, duties, dates performing those duties, current position or the date of the individual's resignation, and the nature of the information possessed by each individual concerning Respondent's procurement of Materials.**

Alcoa has not located or identified any documents or records responsive to Request No. 20.

- 21. Describe how each type of waste containing any SOIs was collected and stored at the Facilities prior to disposal/recycling/sale/transport, including:**
- a. the type of container in which each type of waste was placed/stored;**
 - b. how frequently each type of waste was removed from the Facility;**
- Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.**

Not applicable. See responses to Request Nos. 4 and 17, above.

- 22. Describe the containers used to remove each type of waste containing any SOIs from the Facilities, including but not limited to:**
- a. the type of container (e.g. 55 gal. drum, dumpster, etc.);**
 - b. the colors of the containers;**
 - c. any distinctive stripes or other markings on those containers;**
 - d. any labels or writing on those containers (including the content of those labels);**
 - e. whether those containers were new or used; and**
 - f. if those containers were used, a description of the prior use of the container;**
- Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.**

Not applicable. See responses to Request Nos. 4 and 17, above.

- 23. For each type of waste generated at the Facilities that contained any of the SOIs, describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling and identify all parties to each contract, agreement, or other arrangement described. State the ownership of waste containers as specified under each contract, agreement, or other arrangement described and the ultimate destination or use for such containers. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.**

Not applicable. See response to Request No. 4, above.

- 24. Identify all individuals who currently have, and those who have had, responsibility for Respondents environmental matters (including responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes and SHCs). Provide the job title, duties, dates performing those duties, supervisors for those duties, current**

position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

To the best of Alcoa's knowledge, only the San Francisco Can Plant sold empty and clean drums to the Bay Area Drum Site. Attached as Exhibit C to this response is a list of all Alcoa employees that, to the best of Alcoa's knowledge, have, or previously had, responsibility for environmental matters at Reynolds's facilities located in the United States.

25. Did Respondent ever purchase drums or other containers from a drum recycler or drum reconditioner? If yes, identify the entities or individuals from which Respondent acquired such drums or containers.

Alcoa has not located or identified documents or records responsive to Request No. 25.

26. Prior to 1988, did Respondent always keep its waste streams that contained SOIs separate from its other waste streams?

Not applicable. See response to Request No. 4, above.

27. Identify all removal and remedial actions conducted pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601 et seq., or comparable state law; all corrective actions conducted pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq.; and all cleanups conducted pursuant to the Toxic Substances Control Act, 15 U.S.C. § 2601 et seq. where (a) one of the COCs was addressed by the cleanup and (b) at which Respondent paid a portion of cleanup costs or performed work. Provide copies of all correspondence between Respondent and any federal or state government agency that (a) identifies a COC and (b) is related to one of the above-mentioned sites.

Alcoa has not located or identified documents or records responsive to Request No. 27.

28. Provide all records of communication between Respondent and Bay Area Drum Company, Inc.; Meyers Drum Company; A.W. Sorich Bucket and Drum Company; Waymire Drum Company, Inc.; Waymire Drum and Barrel Company, Inc.; Bedini Barrels Inc.; Bedini Steel Drum Corp.; Bedini Drum; or any other person or entity that owned or operated the facility located at 1212 Thomas Avenue, in the City and County of San Francisco, California.

Alcoa has not located or identified documents or records responsive to Request No. 28.

29. Identify the time periods regarding which Respondent does not have any records regarding the SOIs that were produced, purchased, used, or stored at the Facilities.

Not applicable. See response to Request No. 4, above.

30. Provide copies of all documents containing information responsive to the previous twenty-nine questions and identify the questions to which each document is responsive.

Attached as Exhibit D to this response are copies of all documents responsive to EPA's request for information. These documents date back to the early 1980s and would normally be destroyed in accordance with Reynolds's document retention policy. However, they have been retained as part of the file related to DTSC's 1992 inquiry.

Alcoa believes these responses, including the exhibits hereto, are responsive to EPA's request for information. Alcoa would be pleased to assist you further, if necessary.

EXHIBIT A

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

May 22, 1992

RECEIVED
MAY 26 1992
ESCAN

Mike Gilbert
Administrative Manager
Reynolds Metals Company
2425 Whipple Rd.
Hayward, CA 94540

Dear Mr. Gilbert:

This letter is to request information regarding Reynolds Metals Company's past business relationship with the Bay Area Drum Company (BADC) that operated at 1212 Thomas Avenue, San Francisco. Our records indicate that Reynolds Metals Company sent drums to the BADC site. The purpose of this letter is to request information from companies who did business with the Bay Area Drum Company to obtain information regarding the type and quantity of hazardous substances that were sent to the BADC site.

The Department is interested in the nature of transactions between Reynolds Metals Company and BADC. Please answer the following questions as specifically as possible:

- 1) The approximate number of drums shipped to BADC between 1948 through 1987.
- 2) The nature of the substances contained in subject drums
- 3) The type and capacity of each drum
- 4) The disposition of subject drums after the substances were used
- 5) The residual level in each drum after they were shipped offsite
- 6) Methods used to determine the residual levels in each drum
- 7) Were drums sent to the BADC for reconditioning?
- 8) Were drums sent to the BADC for disposal?

Please provide responses to the aforementioned questions within thirty (30) days of the date of this letter. Compliance with the information request set forth is mandatory pursuant to sections 25185.6, 25358.1 and 25358.3 of the California Health and Safety Code. Failure to respond fully and truthfully to the information request may result in enforcement action by the Department, subject to



the penalties allowed under Sections 25189, 25189.2, 25191 and 25367 of the Health and Safety Code. The penalty provided is up to \$25,000 for each violation and up to \$25,000 per day for each day that the violation continues. Please be further advised that provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties.

Please send your response to: Monica Gan
Cal-EPA, Dept. of Toxic
Substances Control
700 Heinz Ave. Bldg. F
Berkeley, CA 94710

I can be contacted at (510) 540-3767 if you have any questions regarding this matter.

Sincerely,

Monica Gan

Monica Gan,
Staff Services Analyst
Site Mitigation Branch

cc: Susan Bertken
Senior Staff Attorney
Dept. of Toxic Substances Control
P.O. Box 806,
Sacramento, CA 95814

EXHIBIT B



REYNOLDS METALS COMPANY

6601 W. BROAD STREET • RICHMOND, VIRGINIA 23230-1701
MAILING ADDRESS: P.O. BOX 27003 • RICHMOND, VIRGINIA 23261-7003

LAW DEPARTMENT

TELEX: 442-7015 REYLA
TELECOPY: (804)281-3740
CABLE: REYMETCO

Tel. (804) 281-4753

VIA DHL WORLDWIDE

June 19, 1992

Ms. Monica Gan
Cal-EPA, Department of Toxic
Substances Control
700 Heinz Avenue, Building F
Berkeley, CA 94710

RE: Bay Area Drum Company ("BADC")

Dear Ms. Gan:

This letter is in response to your letter to Mike Gilbert of Reynolds Metals Company ("Reynolds") dated May 22, 1992, in which you requested certain information concerning the above-named site.

Reynolds is interested in cooperating with both the Cal-EPA and with the other potentially responsible parties regarding the proposed actions for the Site. This willingness to cooperate, however, should not be taken as an admission of liability or responsibility regarding the site.

Please direct future correspondence on this matter directly to me at the following address:

James E. McKinnon, Esquire
Reynolds Metals Company
6601 West Broad Street
Richmond, Virginia 23230

The following is Reynolds' response to the Department's request for information. Reynolds has limited its response to its San Francisco Can Plant ("the plant"), 2425 Whipple Road, Hayward, CA 94540.

Ms. Monica Gan
Page 2
June 19, 1992

Question 1: The approximate number of drums shipped to BADC between 1948 through 1987.

Answer 1: Reynolds' documents indicate 1,328 drums were purchased and transported by BADC. Reynolds has no knowledge if these drums were delivered to the Site.

Question 2: The nature of the substances contained in subject drums.

Answer 2: Reynolds sold empty drums to BADC. Prior to the drums being emptied, they most likely contained petroleum-based process and lubrication oils or a washer solution containing a diluted solution of either sulfuric or hydrofluoric acid.

Question 3: The type and capacity of each drum.

Answer 3: The capacity of each of the drums was 55 gallons. According to the attached documents, the type of drums were scrap lined drums, scrap unlined drums, and scrap plastic drums.

Question 4: The disposition of subject drums after substances were used.

Answer 4: In general, as much of the substances as possible were removed from the drums. The drums were stored from approximately 30-120 days in the drum yard. The drum yard was outside the plant, but within the plant property boundaries.

Question 5: The residual level in each drum after they were shipped offsite.

Answer 5: Reynolds emptied the drums as much as possible of all substances. One current employee recalls that BADC would not buy any drums from Reynolds with any liquids in the drums.

Question 6: Methods used to determine the residual levels in each drum.

Answer 6: Reynolds visually determined that the drums were empty.

EXHIBIT C

Alcoa Response to EPA CERCLA 104(e) Request Letter - Yosemite Creek Superfund Site
Exhibit C - Response to Request No. 24 (Environmental Employees)

Name	Start Date	End Date	Title	Location
Ashe, Richard D	5/2/1966	Unknown	Environmental Supv.	Benton Harbor, MI
Asp, William F	3/1/1966	3/31/2000	Environmental Coord.	Downingtown, PA
Balge, John W	1/13/1975	Unknown	Envirl Coord	Milwaukee Can Plant
Ballou, Thomas B	7/1/1991	Unknown	Env. Quality Supt.	Unknown
Beard, Robert A	2/13/1980	Unknown	Env/Health/Saf Mgr	Bellwood Printing
Benoit, Vaughn A	12/1/1983	3/31/2002	Process Eng/Env.Rep	Baton Rouge, Louisiana
Bertonneau, Brian D	10/25/1993	11/30/2000	Envrnmntl Attorney	Richmond, Virginia
Boak, William W	9/15/1980	Unknown	Env.Compliance Facil	Massena, New York
Boehler, Jeffery A	4/1/1981	8/9/1998	Envirl Control Mgr	Reidsville Can Plant
Bonty, Randall W	10/10/1988	Unknown	Wwt/Envir. Supv.	Monticello Can Plant
Bosserman, Lisa L	4/1/1995	Unknown	Pltsftyenvirlcoord	Louisville, Kentucky
Brewer, Brenda J	10/16/1995	3/20/1998	Pltsftyenvirlcoord	Louisville, Kentucky
Broocke, David C	5/13/1996	Unknown	Env/Reg Affairs Mgr	Richmond, Virginia
Brooks, Dennis G	12/16/1981	9/29/2000	Mtrl/Envir Techy Mgr	Knoxville, Tennessee
Carlisle, Joplin Riley	5/15/1990	Unknown	Environmental And Sa	Unknown
Childress, Allen Bruce	9/18/1989	Unknown	Enviornmental Safety	Unknown
Coleman, Laura A	9/13/1993	Unknown	Env/Hlth/Safety Mgr	Knoxville, Tennessee
Deckert, Camille Ferreri	6/17/1991	7/7/2006	Env.Health & Saf.Spe	Richmond, Virginia
Diiorio, Anthony	6/14/1965	Unknown	Area Envirl Manager	Richmond, Virginia
Dott, David G	5/3/1993	Unknown	Envirl Engr	Louisville, Kentucky
Felling, Gregory	6/4/1973	Unknown	Env/Tech Coordinator	Texarcana, Texas
Giesecking, Randall A	8/28/1995	Unknown	Reg Envir/Safety Mgr	Auburn Extrusion Plant
Grover, Patrick F	4/20/1992	Unknown	Environmental Mgr	Richmond, Virginia
Hall, Robert M	5/1/1986	Unknown	Div Envirl Mgr (Wc)	Unknown
Hansen, James L.	12/9/1996	12/3/2001	Enviro Engr/Superv	Beliot, Wisconsin
Hoskins, Lori J.	8/27/1990	6/30/1997	Div Env& Ind Hyg Mgr	Richmond, Virginia
Hunt, Robert A	10/1/1987	4/14/2000	Env/Hlth/Safety Mgr	Richmond, Virginia
Hunter, Jason	5/3/1996	Unknown	Rcb - Denver West	Unknown
Johnson, Donald L	9/16/1980	Unknown	Envirl Coord	Torrance, California
Johnson, Paul B	7/25/1988	3/31/1999	Mgr/Environ Svc	Unknown
Lenney, Robert J	6/23/1987	8/31/2001	Mgr, Remediation Strg	Reydarfjordur, Iceland
Mace, Timothy R	10/15/1973	2/26/2001	Env. Engineer	Longview, Washington
Mckinnon, James E	6/17/1985	1/15/2001	Chief Envirl Counsel	Richmond, Virginia
Mcmaster, Wesley C	4/16/1993	Unknown	Environ Technologist	Texarcana, Texas
Medellin, Jose P	7/29/1974	Unknown	Environ. Specialist	Unknown

Alcoa Response to EPA CERCLA 104(e) Request Letter - Yosemite Creek Superfund Site
Exhibit C - Response to Request No. 24 (Environmental Employees)

Name	Start Date	End Date	Title	Location
Mitchell, Jerry F	10/16/1968	3/31/1999	Qlt/Saf/Env Assr Mrg	Muscle Shoals, Alabama
Mittiga, Roy F	7/13/1988	Unknown	Env.Srv. Lead Suprv.	Massena, New York
Moore, Timothy N	12/29/1997	8/13/1999	Env. Control Supv.	Troutdale, Oregon
Murphy-Wimmer, Vicky	3/4/1991	12/31/2002	Env.Srv. Flow Leader	Massena, New York
Nadermann, Kristin K	6/24/1991	4/13/2001	Environ & Lab Mgr	Unknown
Nealis, Gregory L	5/18/1981	Unknown	Div Mgr Envir/Saf/Hy	Kansas City Can Plant
Neff, Michelle C	9/21/1992	3/16/1997	Ind Eng/Env Coord	Asheville Plant
Olive, Ronald G	3/15/1974	3/31/1999	Environ Control Mgr	Muscle Shoals, Alabama
Parent, Jordan J	5/16/1996	Unknown	Environ Engineer	Massena, New York
Parker, Leo W	7/29/1974	Unknown	Envirl/Tpm Engr	Richmond, Virginia
Pongetti, David	5/23/1966	Unknown	Mgr. Of Environ. Ser	Muscle Shoals, Alabama
Poole, Paula K.	6/18/1990	Unknown	Plt. Environmental	Lake Charles, Louisiana
Radtke, Cindy H	8/16/1979	3/31/1999	Environ Control Mgr	Unknown
Sandoval, Antonio A	6/14/1976	11/15/2000	Env.Control Supv	Troutdale, Oregon
Schon, James E	9/9/1999	Unknown	Environmental Mgr	Ferndale, Washington
Scott, Sheila D	4/16/1991	Unknown	Environmental Engr	Unknown
Shepherd, D Lyn	8/1/1979	Unknown	Envir/Tech Coord	Arkadelphia, Arkansas
Taylor, Cathy C	2/8/1988	10/31/2000	Corp Dir Environment	Richmond, Virginia
Thomas, T. Kent	12/20/1993	Unknown	Env Compliance Facil	Unknown
Tolin, Michael J	7/1/1995	9/29/2002	Env.Hlth.& Sfty. Mgr	Louisville, Kentucky
Tropea, Lawrence C	3/1/1973	Unknown	Corp Dir Environment	Unknown
Truitt, Timothy J.	3/12/1996	3/31/1999	Environ Control Mgr	Unknown
Veasey, Theresa L	1/1/1995	7/31/1998	Envrl Hlth Safty Mgr	Louisville, Kentucky
Wacaser, Marion E	12/1/1992	Unknown	Reg Coord Env/Saf/Hy	Tampa, Florida
Weissinger, Thomas R.	6/13/1996	Unknown	Lab & Envirl Mgr	Massena, New York
Whitaker, Beverly Y	1/1/1990	Unknown	Indust Nurse A/Env &	Unknown
Whitley, Terry H	5/21/1979	Unknown	Safety & Environment	Hot Springs, Arkansas
Whittaker, Shaun L	5/20/1996	5/11/1997	Environmental Specia	Unknown
Meleason, Timothy J	10/02/98	12/21/01	Environ Area Team Ldr Ii	Richmond, Virginia
Argento, Nicholas F	08/26/02	02/28/03	Multi EHS Staff Assoc Engr	Rogers, Minnesota
Bausman, Damian	01/02/03	05/14/05	Multi EHS Staff Assoc Engr	Visalia, California

Alcoa Response to EPA CERCLA 104(e) Request Letter - Yosemite Creek Superfund Site
Exhibit C - Response to Request No. 24 (Environmental Employees)

Name	Start Date	End Date	Title	Location
Ferguson,Benjamin J	03/26/01	02/01/04	Multi EHS Staff Assoc Engr	Rogers, Minnesota
Johnson,Thurl D	09/11/00	10/16/04	Multi EHS Staff Assoc Engr	Visalia, California
Kauffman,Tracey	09/20/06	03/07/08	Multi EHS Mgr	Wakefield, Massachusetts
Lanie,Patrick E	08/18/86	07/01/06	Multi EHS Process Ldr II	Grant Park, Illinois
Leafy,Gary L	09/02/97	01/31/07	Multi EHS Tech II	Sparks, Nevada
Lueth,Patrick Schwan	01/03/00	12/14/05	Multi EHS Process Ldr II	Grant Park, Illinois
Plehal,Joseph A	04/23/07	03/01/08	Multi EHS Process Ldr II	Rogers, Minnesota
Brown,James C	10/24/77	07/01/02	Sr Staff Environ Engineer	Richmond, Virginia
Klatt,Robert A	05/01/83	01/01/08	Multi EHS Staff Assoc Engr	Ewa Beach, HI
Patel,Anil U	12/01/83	12/21/01	Sr Staff Environ Engineer	Richmond, Virginia
Adey, Michelle L	11/01/98	Unknown	Professional	Massena, New York
Alawami, Saeed	01/09/06	11/15/06	Associate Team Leader	Louisville, Kentucky
Anderson, Mary G	12/01/83	Unknown	Team Leader	Lake Charles, Louisiana
Benoit, Vaughn A	12/01/83	Unknown	Process Leader	Baton Rouge, Louisiana
Boak, William W	05/01/89	Unknown	Senior Professional	Massena, New York
Gee, Brandi R.	05/10/04	Unknown	Associate Professional	Louisville, Kentucky
Golden, Rebecca J	03/29/93	Unknown	Senior Technician	Arkadelphia, AR
Grover, Patrick F	04/20/92	Unknown	Senior Staff Manager	Richmond, Virginia
Hansen, Brent T	12/01/97	Unknown	Associate Professional	Massena, New York
Helgerman, William A	10/11/71	Unknown	Specialist	Richmond, Virginia
Hertzog, Dustin G	05/17/04	Unknown	Professional	Downingtown, PA
Lavine, Ted W	07/12/93	Unknown	Process Leader	Massena, New York
Long, Timothy P	07/01/98	Unknown	Process Leader	Massena, New York
Mittiga, Roy F	05/01/90	Unknown	Process Leader	Massena, New York
Murphy-Wimmer, Vicky L	03/04/91	Unknown	Staff Supervisor	Massena, New York
Padgett, Bobby J	01/01/96	Unknown	Staff Supervisor	Lake Charles, Louisiana
Parent, Jordan J	05/26/98	Unknown	Staff Supervisor	Massena, New York
Poole, Paula K	06/18/90	Unknown	Senior Professional	Lake Charles, Louisiana
Rade, Irving H	12/10/07	Unknown	Staff Supervisor	Lake Charles, Louisiana
Shelby, Laurie M	01/20/00	09/28/09	Senior Consultant	Richmond, Virginia Metals
Stoneberger, Michael W	01/23/02	Unknown	Process Leader	Richmond,Virginia
Strain, William C	01/15/64	Unknown	Staff Manager	Richmond, Virginia
Thomas, T Kent	12/20/93	Unknown	Professional	Arkadelphia, AR
Tolin, Michael J	07/01/95	Unknown	Senior Professional	Louisville, Kentucky
Hansen, James L	12/09/96	Unknown	Professional	Beloit, Wisconsin

EXHIBIT D

The total amount of drums shipped during this period equals 1,328.

Please know information concerning the type of residue materials in the drums is not ascertainable on MSO documentation.

Given the consistency of shipments in 1981 and 1982, drums were probably shipped to subject site prior to 1981.

Please know the State has requested I turn over all information on file regarding shipments to the site from 1948 through 1987. Please find attached letter. The deadline date for submittal is June 21, 1992.

Please advise next plan of action.

Thank you.



Mike Gilbert



REYNOLDS METALS COMPANY

SAN FRANCISCO CANT
2425 WHIPPLE RD.
HAYWARD, CA. 94540

MISCELLANEOUS SHIPPING ORD.
TAW

TO, RETURNED TO, PURCHASED FROM

AREA-DRUM
12 THOMAS AVE.
SAN FRANCISCO, CA. 94124

SHIP TO

M.S.O. NO. CNK-54-5691	DATE 81-01-26
CUST. ORDER NO.	OUR P.O. NO. N/A
TERMS	CREDIT
F.O.B. S.P.	
SHIP VIA CUST	<input type="checkbox"/> PREPAID <input checked="" type="checkbox"/> COLLECT
REQUESTING DEPT. HAROLD HOLLENSHEAD	

QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL AMOUNT
18 ea	SALE OF SCRAP UNLINED DRUMS	\$5.00/ea	\$90.00
40 ea	SALE OF SCRAP LINED DRUMS	\$1.50	\$60.00
12 ea	SALE OF SCRAP PLASTIC DRUMS	\$2.50/ea	\$30.00
		TOTAL	\$180.00

NOTE: MAKE CHECK PAYABLE TO: REYNOLDS METALS CO
2425 WHIPPLE RD.
HAYWARD, CA. 94540

RECEIVED BY *John Hollenshead*

FOR SHIPMENT OF SCRAP DRUMS	CARRIER CUSTOMERS TRUCK	DATE SHIPPED 81-01-26
INSTRUCTIONS LETE UPON SHIPMENT	ACCOUNT NO.	BILL OF LADING NO. 019681
INVOICE NO.	INVOICE DATE	DEBIT MEMO NO.
REC'D BY (PURCH. AGENT) <i>f. Rogers</i> ROGERS	CR.	REGG. REPORT NO.



REYNOLDS METALS COMPANY

SAN FRANCISCO CAN PLANT
2425 WHIPPLE RD.
HAYWARD, CA. 94540

MISCELLANEOUS SHIPPING ORDER
TAW

TO, RETURNED TO, PURCHASED FROM
BAY AREA DRUM
1212 THOMAS AVE.
SAN FRANCISCO, CA. 94124

SHIP TO

M.S.O. NO. CNK-54-5919 DATE 81-07-31

CUST. ORDER NO. OUR P.O. NO. N/A

TERMS CREDIT

F.O.B. S.P.

SHIP VIA CUST ☐ PREPAID ☒ COLLECT

REQUESTING DEPT. HAROLD HOLLENSHEAD

ITEM NO.	QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL AMOUNT
1	55 ea	SALE OF UNLINED SCRAP DRUMS	\$1.00 \$5.00/ea	\$275.00
2	34 ea	SALE OF LINED SCRAP DRUMS	\$1.50 ea	\$51.00
3	32 ea	SALE OF PLASTIC SCRAP DRUMS	\$2.00/ea	\$64.00
4	67 ea	SALE OF PLASTIC ACT 2 SCRAP DRUMS	\$5.00/ea	\$335.00
			TOTAL	\$725.00

RECEIVED BY Jack Hamilton

NOTE: MAKE CHECK PAYABLE TO: REYNOLDS METALS CO
2425 WHIPPLE RD
PAID BY CHECK #0965 HAYWARD, CA. 94540

REASON FOR SHIPMENT ALL OF SCRAP DRUMS	CARRIER CUSTOMERS TRUCK	DATE SHIPPED 81-07-31
SPECIAL INSTRUCTIONS COMPLETE UPON SHIPMENT	ACCOUNT NO.	AMOUNT
APPROVED BY (PURCH. AGENT) <u>H. L. Rogers</u> H. L. ROGERS	DR. CL.	BILL OF LADING NO. INVOICE NO. INVOICE DATE DEBIT MEMO NO. REC'D. REPORT



REYNOLDS METALS COMPANY

SAN FRANCISCO PLANT

2425 WHIPPLE ROAD

HAYWARD, CA. 94540

MISCELLANEOUS SHIPPING ORDER

LCH

TO, RETURNED TO, PURCHASED FROM

BAY AREA DRUM
1212 THOMAS AVE
SAN FRANCISCO, CA.

94124

SHIP TO

M.S.O. NO.

CNK-54-5947

DATE

81-08-28

CUST. ORDER NO.

OUR P.O. NO.

N/A

TERMS

CREDIT

F.O.B.

S.P.

SHIP VIA

V. TRUCK

☐ PREPAID

☒ COLLECT

REQUESTING DEPT.

H.H.

QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL AMOUNT
22 ea	SALE OF UNLINED SCRAP DRUMS	\$5.00/ea	\$110.00
27 ea	SALE OF LINED SCRAP DRUMS	\$1.50/ea	\$40.50
31 ea	SALE OF PLASTIC SCRAP DRUMS	\$2.00/ea	\$62.00
68 ea	SALE OF PLASTIC ACT 2 SCRAP DRUMS	\$5.00/ea	\$340.00
TOTAL			\$552.50

RECEIVED BY

John H. Hamilton

NOTE: MAKE CHECK PAYABLE TO: REYNOLDS METALS CO.

2425 WHIPPLE ROAD

PAID BY: CHECK # 1111 HAYWARD, CA. 94540

OR SHIPMENT

SCRAP DRUMS

CARRIER

VENDORS TRUCK

DATE SHIPPED

81-08-28

BILL OF LADING NO.

021228

INSTRUCTIONS

ACCOUNT NO.

AMOUNT

INVOICE NO.

UPON SHIPMENT

DR.

CR.

INVOICE DATE

(PURCH. AGENT)

Rogers
ROGERS

DEBIT MEMO NO.

RECO. REPORT NO.

222
222
222



REYNOLDS METALS COMPANY

SAN FRANCISCO CAN PLANT
2425 WHIPPLE RD.
HAYWARD, CA. 94540

MISCELLANEOUS SHIPPING ORDER

TAX

TO, RETURNED TO, PURCHASED FROM

AREA DRUM
112 THOMAS AVE.
SAN FRANCISCO, CA. 94124

SHIP TO

M.S.O. NO.	DATE
CNK-54-6060	81-11-13
CUST. ORDER NO.	OUR P.O. NO.
	N/A
TERMS	CREDIT
F.O.B.	S.P.
SHIP VIA	<input type="checkbox"/> PREPAID
CUST TRUCK	<input checked="" type="checkbox"/> COLLECT
REQUESTING DEPT.	

ITEM NO.	QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL AMOUNT
1	55 ea	SALE OF UNLINED DRUMS	\$5.00/ea	\$275.00
2	125 ea	SALE OF LINED SCRAP DRUMS	\$1.50/ea	\$187.50
				\$462.50

RECEIVED BY *J. Hamilton*

NOTE: MAKE CHECK PAYABLE TO: REYNOLDS METALS CO
2425 WHIPPLE RD
HAYWARD, CA. 94540

check # 1465

REASON FOR SHIPMENT

SALE OF SCRAP DRUMS

CARRIER

CUSTOMERS TRUCK

DATE SHIPPED

81-11-13

BILL OF LADING NO.

SPECIAL INSTRUCTIONS

COMPLETE UPON SHIPMENT

ACCOUNT NO.

AMOUNT

INVOICE NO.

INVOICE DATE

DEBIT MEMO NO.

REG. REPC

APPROVED BY (PURCH. AGENT)

G.L. ROGERS



REYNOLDS METALS COMPANY

SAN FRANCISCO CAN PLANT
2425 WHIPPLE ROAD
HAYWARD, CA. 94540

MISCELLANEOUS SHIPPING ORDER
TAN

OLD TO, RETURNED TO, PURCHASED FROM

SHIP TO

LY AREA DRUM
212 THOMAS AVE
SAN FRANCISCO, CA. 94124

M.S.O. NO. CNK-54-6209	DATE 82-03-11
CUST. ORDER NO. 7011 100 3	OUR P.O. NO. N/A
TERMS 2/10	CREDIT
F.O.B. S.P.	
SHIP VIA CUST TRUCK	<input type="checkbox"/> PREPAID <input checked="" type="checkbox"/> COLLECT
REQUESTING DEPT. H.H.	

QTY	QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL AMOUNT
17 ea	17 ea	SALE OF PLASTIC ACT 2 DRUMS, SCRAP	\$5.00/ea	\$85.00
114 ea	114 ea	SALE OF LINED DRUMS, SCRAP	\$1.50	\$171.00
			TOTAL	\$256.00

RECEIVED BY *Jak Hamilton*

NOTE: MAKE CHECK PAYABLE TO: REYNOLDS METALS CO
2425 WHIPPLE ROAD
HAYWARD, CA. 94540

REASON FOR SHIPMENT SALE OF SCRAP DRUMS	CARRIER CUSTOMERS TRUCK	DATE SHIPPED 82-03-11
SPECIAL INSTRUCTIONS COMPLETE UPON SHIPMENT	ACCOUNT NO.	BILL OF LADING NO.
APPROVED BY (PURCH. AGENT) <i>J.L. Rogers</i> J.L. ROGERS	AMOUNT	INVOICE NO.
	DR.	INVOICE DATE
	CR.	DEBIT MEMO NO.
		REGG. REPORT N

ENC. 17
AMOUNT



REYNOLDS METALS COMPANY

SAN FRANCISCO CAN PLANT
2425 WHIPPLE ROAD
HAYWARD, CA. 94540

MISCELLANEOUS SHIPPING ORD

TAW

OLD TO, RETURNED TO, PURCHASED FROM

BAY AREA DRUM
1212 THOMAS AVE.
SAN FRANCISCO, CA. 94124

SHIP TO

M.S.O. NO.	DATE
CNK-54-6310	82-05-1
CUST. ORDER NO.	OUR P.O. NO.
	N/A
TERMS	CREDIT
F.O.B.	S.P.
SHIP VIA	<input type="checkbox"/> PREPAID
CIST TRUCK	<input checked="" type="checkbox"/> COLLECT
REQUESTING DEPT.	
H.H.	

ITEM NO.	QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL AMT
1	54 ea	SALE OF UNLINED SCRAP DRUMS	\$5.00/ea	\$270.
2	98 ea	SALE OF LINED SCRAP DRUMS	\$1.50 ea	\$147.
3	4 ea	SALE OF PLASTIC SCRAP DRUMS	\$2.50	\$10.
			TOTAL	\$427.

RECIEVED BY *John Hamilton*

NOTE: MAKE CHECK PAYABLE TO: REYNOLDS METALS CO
2425 WHIPPLE ROAD
HAYWARD, CA. 94540

((((PAID BY CHECK #2334)))

REASON FOR SHIPMENT	CARRIER	DATE SHIPPED
SALE OF SCRAP DRUMS	CUSTOMERS TRUCK	82-05-17
SPECIAL INSTRUCTIONS	ACCOUNT NO.	BILL OF LADING NO.
COMPLETE UPON SHIPMENT	AMOUNT	023503
APPROVED BY (PURCH. AGENT)	DR.	INVOICE NO.
<i>D.F. Wilson</i>	CR.	INVOICE DATE
D.F. WILSON		DEBIT MEMO NO.
		REG. REPORT

RECEIVING TICKET

BAY AREA DRUM CO. Inc.



Drums Bought, Sold and Reconditioned

1212 THOMAS AVENUE SAN FRANCISCO, CA 94124 PHONE: (415) 822-3955

☒ PURCHASED ☐ INVENTORY

Date 6-22-82

No 0235

Received from REHOLDS METAL'S

Address _____

Acct. of: _____

QUANTITY	DESCRIPTION
10	55 GAL. = 1 OIL TOP BUNG
	55 GAL. = 2 OIL TOP BUNG
	55 GAL. DEHE. 1 RS SHORT
	55 GAL. DEHEADERS TALL
	55 GAL. JUNKERS
	55 GAL. F.O.T. L.L. TALL
	55 GAL. F.O.T. L.L. SHORT
	55 GAL. F.O.T. 17H
	55 GAL. F.O.T. BOLT TALL
	55 GAL. F.O.T. BOLT SHORT
	55 GAL. F.O.T. ADG.
	30 GAL. OIL # 1
	30 GAL. OIL DEHEADERS
	30 GAL. F.O.T. BOLT
	30 GAL. F.O.T. L.L.
	TOTAL

\$50.00

*PAID
Cash
BY [Signature]*

7605



REYNOLDS METALS COMPANY

SAN FRANCISCO CAN PLANT
2425 WHIPPLE ROAD
HAYWARD, CA. 94540

MISCELLANEOUS SHIPPING OF

SOLD TO, RETURNED TO, PURCHASED FROM

BAY AREA DRUM
1212 THOMAS AVE
SAN FRANCISCO, CA. 94124

SHIP TO

M.S.O. NO.	DATE
CHK-54-6368	82-06-2
CUST. ORDER NO.	OUR P.O. NO.
	N/A
TERMS	CREDIT
F.O.B.	S.P.
SHIP VIA	<input type="checkbox"/> PREPAID
CUST	<input checked="" type="checkbox"/> COLLECT
REQUESTING DEPT.	
HAROLD HOLLENSHEAD	

ITEM NO.	QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL AMT
1	12 ea	SALE OF UNLINED DRUMS	\$5.00	\$60.00
2	87 ea	SALE OF LINED DRUMS	\$1.50/ea	\$130.50
		TOTAL		\$190.50
NOTE: MAKE CHECK PAYABLE TO: REYNOLDS METALS CO 2425 WHIPPLE ROAD HAYWARD, CA. 94540				
RECEIVED BY <i>John Horvath</i> (((PAID BY CHECK #2467)))				

REASON FOR SHIPMENT

SALE OF SCRAP DRUMS

SPECIAL INSTRUCTIONS

COMPLETE UPON SHIPMENT

APPROVED BY (PURCH AGENT)

S.G. FORSTROM

CARRIER

CUSTOMER STRUCK

DR.

CR.

ACCOUNT NO.

AMOUNT

DATE SHIPPED

82-06-23
BILL OF LADING NO.

INVOICE NO.

INVOICE DATE

DEBIT MEMO NO.

RECO. REPORT



REYNOLDS METALS COMPANY

SAN FRANCISCO, CALIF.
2425 WHIPPLE ROAD
HAYWARD, CA. 94540

MISCELLANEOUS SHIPPING ORDER
TAX

OLD TO, RETURNED TO, PURCHASED FROM

SHIP TO

BAY AREA DRUM SALES
1212 THOMAS AVE
SAN FRANCISCO CA. 94124

M.S.O. NO. CNK-54-6505

DATE 10-11-82

CUST. ORDER NO.

OUR P.O. NO. N/A

TERMS

CREDIT

F.O.B.

S.P.

SHIP VIA

☐ PREPAID

CUST TRUCK

☒ COLLECT

REQUESTING DEPT.

ITEM NO.	QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL AMC
1	29 ea	SALE OF SCRAP UNLINED DRUMS	\$5.00/ea	\$145.00
2	55 ea	SALE OF SCRAP LINED DRUMS	\$1.50/ea	\$ 82.50
		SCRAP DRUMS - 150 CM	TOTAL	\$227.50
(((PAID BY CHECK #2866)))				
NOTE: MAKE CHECK PAYABLE TO: REYNOLDS METALS CO 2425 WHIPPLE ROAD HAYWARD, CA. 94540				
RECEIVED BY <i>Jak Hamilton</i>				

REASON FOR SHIPMENT

SALE OF SCRAP DRUMS

CARRIER

CUSTOMERS TRUCK

DATE SHIPPED

10-11-82

BILL OF LADING NO.

SPECIAL INSTRUCTIONS

COMPLETE UPON SHIPMENT

ACCOUNT NO.

AMOUNT

INVOICE NO.

INVOICE DATE

DEBIT MEMO NO.

RECG. REPO

APPROVED BY (PURCH. AGENT)

W.H. EHLERS



REYNOLDS METALS COMPANY

SAN FRANCISCO, CALIF.
2425 WHIPPLE ROAD
HAYWARD, CA. 94540

MISCELLANEOUS SHIPPING ORD

OLD TO, RETURNED TO, PURCHASED FROM

AY AREA DRUM SALES
212 THOMAS AVE
AN FRANCISCO, CA. 94124

SHIP TO

TAX	
M.S.O. NO.	DATE
CNK-54-6671	3-1-83
CUST. ORDER NO.	OUR P.O. NO.
	N/A
TERMS	CREDIT
F.O.B.	
EXSTOCK S.P.	
SHIP VIA	<input type="checkbox"/> PREPAID
CUST TRUCK	<input checked="" type="checkbox"/> COLLECT
REQUESTING DEPT.	

TEM NO.	QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL AMC
1	4 ea	SALE OF SCRAP UNLINED DRUMS	\$5.00/ea	\$20.00
2	43 ea	SALE OF SCRAP LINED DRUMS	\$1.50/ea	\$64.50
			TOTAL	\$84.50

((PAID BY CHECK NUMBER 3369))

NOTE: MAKE CHECK PAYABLE TO: REYNOLDS METALS CO
2425 WHIPPLE ROAD
HAYWARD, CA. 94540

RECIEVED BY *Juk H. [Signature]*

REASON FOR SHIPMENT	CARRIER	DATE SHIPPED
SALE OF SCRAP DRUMS	CUSTOMERS TRUCK	3-1-83
SPECIAL INSTRUCTIONS	ACCOUNT NO.	BILL OF LADING NO.
	AMOUNT	025893
	INVOICE NO.	
COMPLETE UPON SHIPMENT PLEASE ISSUE INVOICE	DR.	INVOICE DATE
APPROVED BY (PURCH. AGENT)	CR.	DEBIT MEMO NO.
<i>C.W. Daugherty</i> C.W. DAUGHERTY		REC'D, REPORT



REYNOLDS METALS COMPANY

SAN FRANCISCO, CALIF.
2425 WHIPPLE ROAD
HAYWARD, CA. 94540

MISCELLANEOUS SHIPPING OF
TAN

SOLD TO, RETURNED TO, PURCHASED FROM

BAY AREA DRUM CO INC.
1212 THOMAS AVE
SAN FRANCISCO, CA. 94124

SHIP TO

COMPLETE

M.S.O. NO. CNK-54-6975
DATE 8-30-83

CUST. ORDER NO. OUR P.O. N/A

TERMS CREDIT

F.O.B. S.P.

SHIP VIA CUST TRUCK ☐ PREPAID ☒ COLLECT

REQUESTING DEPT. DAN RANKIN

ITEM NO.	QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL AMT
1	35 ea	SALE OF UNLINED DRUMS	\$5.00/ea	\$175.00
2	40 ea	SALE OF LINED DRUMS	\$1.50/ea	\$60.00
			TOTAL	\$235.00
(((PAID BY CHECK NUMBER 3869)))				
NOTE: MAKE CHECK PAYABLE TO: REYNOLDS METALS CO 2425 WHIPPLE ROAD HAYWARD, CA. 94545				

COMPLETE

REASON FOR SHIPMENT SALE OF SCRAP DRUMS	CARRIER CUSTOMER TRUCK	DATE SHIPPED 8-2-83
SPECIAL INSTRUCTIONS COMPLETE UPON SHIPMENT PLEASE ISSUE INVOICE	ACCOUNT NO. AMOUNT	BILL OF LADING NO. 027819
APPROVED BY (PURCH AGENT) <i>[Signature]</i> INAC	DR. CR.	INVOICE NO.
		INVOICE DATE
		DEBIT MEMO NO. RECG. REPORT

RECEIVING TICKET

BAY AREA DRUM CO. Inc.



Drums Bought, Sold and Reconditioned

1212 THOMAS AVENUE SAN FRANCISCO, CA 94124 PHONE: (415) 822-3955

☐ PURCHASED ☒ INVENTORY

Date 11-29-84

No 3630

Received from REYNOLDS METAL

Address HAYWARD CA.

Acct. of:

QUANTITY	DESCRIPTION
121	55 GAL. = 1 OIL TOP BUNG
	55 GAL. = 2 OIL TOP BUNG \$1.00 @
	55 GAL. DEHEADERS SHORT
	55 GAL. DEHEADERS TALL
29	55 GAL. JUNKERS
	55 GAL. F.O.T. L.L. TALL
	55 GAL. F.O.T. L.L. SHORT
	55 GAL. F.O.T. 17H
	55 GAL. F.O.T. BOLT TALL
	55 GAL. F.O.T. BOLT SHORT
	55 GAL. F.O.T. ADG.
	30 GAL. OIL # 1
	30 GAL. OIL DEHEADERS
	30 GAL. F.O.T. BOLT
	30 GAL. FOT II

Ad. 6/6/85

CP#1072

\$121.00

Y.M.D.

150 TOTAL PER CARLOS

007602

**REYNOLDS METALS COMPANY**SAN FRANCISCO CAN PLANT
2425 WHIPPLE ROAD
HAYWARD, CA. 94540

MISCELLANEOUS SHIPPING ORDER

TAX

SOLD TO, RETURNED TO, PURCHASED FROM

BAY AREA DRUM
1212 THOMAS AVE
SAN FRANCISCO, CA. 94124

SHIP TO

EXI SAME

M.S.O. NO.

CHK-54-7628

DATE

11-29-84

CUST. ORDER NO.

OUR P.O. NO.

N/A

TERMS

CREDIT

F.O.B.

S.P.

SHIP VIA

☐ PREPAID

COST

☒ COLLECT

REQUESTING DEPT.

ITEM NO.	QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL AMOUNT
1	150	SALE OF EMPTY NON DEPOSIT DRUMS <i>Letter to customer 4-15-85</i> NOTE: MAKE CHECK PAYABLE TO REYNOLDS METALS CO 2425 WHIPPLE ROAD HAYWARD, CA. 94540 RECEIVED BY <i>CAMERON</i>	TED	

REASON FOR SHIPMENT

SALE OF SCRAP DRUMS

CARRIER

CUSTOMERS TRUCK

DATE SHIPPED

11-29-84

BILL OF LADING NO.

031997

INVOICE NO.

INVOICE DATE

DEBIT MEMO NO.

RECO. REPORT NO.

SPECIAL INSTRUCTIONS

MSO TO REMAIN OPEN UNTIL RECEIPT
OF PAYMENT

APPROVED BY (PURCH. AGENT)

S. INAC

This Shipping Order must be legibly filled in, in ink, on one side of the form, and returned to the carrier.

R-459-1 (Rev. 8-60)

NAME OF CARRIER CUSTOMER TRUCK	CARRIER NUMBER
--	----------------

AT Hayward, CA	19 84 MONTH 11 DAY 29	FROM CAN DIVISION REYNOLDS METALS CO., (INC.)
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RECEIVE, subject to the classifications and tariffs in effect on the date of the issue of this Shipping Order, the property described herein, in apparent good order, except as noted hereon, and condition of receipt of property is subject to inspection by the carrier at the place of delivery of said property, and as to such property as is not inspected, the carrier shall not be liable for loss or damage to such property.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, and that he has accepted the classification of tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his agents.

CONSIGNEE TO BAY AREA DRUM	1212 THOMAS AVE
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DESTINATION SAN FRANCISCO,	STATE CODE CA	DESTINATION CODE 94124
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ROUTE CUSTOMER TRUCK

ROUTE CODES EXTRA CUST

DELIVERING CARRIER	VEHICLE - INITIALS AND NUMBER	SEAL NUMBERS
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NUMBER CARS: 1. The description and weight indicated on this Bill of Lading are correct, subject to verification by the GOVERNING WEIGHING AND INSPECTION BUREAU according to agreement.

No. Packages	Type Package	DESCRIPTION OF ARTICLES	WEIGHT (Sub. to Car.)	RATE	FREIGHT CHARGE
		Cans, Aluminum 34 111 20			
		Cans Ends, Aluminum 34 614 22			
		Aluminum Scrap 40 214 30			
350	22	34 912 43 STEEL DRUMS	3,760		

Shipper's Import in law of state not a part of the bill of lading governed by the Interstate Commerce Commission. This section applies on all shipments except: If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight. NOTE-Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. This agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

CUSTOMER ORDER NUMBER	REYNOLDS ORDER NUMBER	ITEM	ACCOUNT CODE	COMMERCIAL DESCRIPTION	FRT CD	NET WEIGHT	PIECES
CHK-54-7628		1		SALE OF EMPTY NON DEPOSIT DRUMS		3,760	34150 NOS PRODUCT

PALLETS	SHROUDS	SEPARATORS	TOP FRAMES	OTHER	MATERIAL TO BE RETURNED
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REYNOLDS METALS CO., (Inc.,) Shipper, Per <u>DAWSON</u>	P.O. Box 4157 Hayward, California 94540
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CARRIER

SHOW BILL OF LADING NUMBER ON ALL FREIGHT BILLS.			
AB6	031997		
BILL IN DUPLICATE			
Less	Mode	Consignee	Delivery
1	F	E	1
Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement: The carrier shall not make delivery of the shipment without payment of freight and all other lawful charges.			
R.M.Co.			
(Signature of consignee) If charges are to be prepaid, write or stamp here "To Be Prepaid"			
NEEDS COLLECT			
Received by _____ to copy in payment of the charges on the property described hereon.			
Agent or Cashier _____			
For _____ (The signature here acknowledges only the amount prepaid.)			
Charge advised: \$ _____			

**REYNOLDS METALS COMPANY**

SAN FRANCISCO CAN PLANT
2425 WHIPPLE ROAD
HAYWARD, CA. 94540

MISCELLANEOUS SHIPPING ORDER**TAX**

ASS NO.	DATE
CMY-54-7628	11-29-84
CUS* ORDER NO.	OUR P.O. NO.
	N/A
TERMS	CREDIT
F.O.B.	
S.P.	
SHIP VIA	<input type="checkbox"/> PREPAID
CUST	<input checked="" type="checkbox"/> COLLECT
REQUESTING DEPT.	

SOLD TO, RETURNED TO, PURCHASED FROM

BAY AREA DRUM
1212 THOMAS AVE
SAN FRANCISCO, CA. 94124

SHIP TO

REX GALT

ITEM NO.	QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL AMOUNT
1	150 150	SALE OF EMPTY NON DEPOSIT DRUMS	TBD	
NOTE: MAKE CHECK PAYABLE TO: REYNOLDS METALS CO 2425 WHIPPLE ROAD HAYWARD, CA. 94540				
RECEIVED BY <u> </u>				

REASON FOR SHIPMENT

SALE OF SCRAP DRUMS

CARRIER

CUSTOMERS TRUCK

DATE SHIPPED

11-29-84

BILL OF LADING NO.

031997

INVOICE NO.

INVOICE DATE

DEBIT MEMO NO.

RECO. REPORT NO.

SPECIAL INSTRUCTIONS

**MSO TO REMAIN OPEN UNTIL RECEIPT
OF PAYMENT**

APPROVED BY (PURCH. AGENT)

DR.

CR.

S. INAC**007603**